

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Case No. 18-CR-20489

Plaintiff,

Thomas L. Ludington

v.

United States District Judge

JAMES D. PIERON, JR.,

Defendant.

_____ /

GOVERNMENT'S LIST OF FILED TRIAL EXHIBITS

The document below lists the government's exhibits that were admitted at trial and the additional exhibits filed by the government to date, along with the docket number and page ID numbers for each exhibit.

Date: July 11, 2019

Matthew Schneider
United States Attorney

s/Jules M. DePorre
Jules M. DePorre (P73999)
Assistant U. S. Attorney
600 Church Street
Flint, Michigan 48502-1280
(810) 766-5026
jules.deporre@usdoj.gov

s/Janet L. Parker
Janet L. Parker (P34931)
Assistant U.S. Attorney
101 First Street, Suite 200
Bay City, MI 48708
(989) 895-5712
janet.parker2@usdoj.gov

Certificate of Service

On July 11, 2019, I filed the attached list of government exhibits via ECF. Counsel of record will automatically be served via the ECF system.

s/Janet L. Parker

Gov. Ex. No.	Description	Docket No.	PgId No.
	Government Trial Exhibits		
13	2005 FBAR Filing	R. 114-1	2025-26
14	2006 FBAR Filing	R. 114-2	2027-29
15	2007 FBAR Filing	R. 114-3	2030-39
17	2008 FBAR Filing	R. 114-4	2040-49
18	2008 Transcript of Account	R.112-2	1801-03
19	2009 FBAR Filing	R. 114-5	2050-59
20	2009 Transcript of Account	R. 112-3	1804-05
21	2010 FBAR Filing	R. 114-6	2060-67
22	2010 Transcript of Account	R. 114-7	2068-70
27	Komplique 2009 Form 1120 Return-Unfiled	R. 114-8	2071-80
34	Pieron 2001 Form 1040 Return	R. 114-9	2081-86
35	Pieron 2003 Form 1040 Return	R. 114-10	2087-91
36	Pieron 2004 Form 1040 Return	R. 114-11	2092-97
37	Pieron 2005 Form 1049 Return	R. 114-12	2098-2103
38	Pieron 2006 Form 1040 Return	R. 114-13	2104-08
39	Pieron 2007 Form 1040 Return	R. 112-4	1806-18
40	Pieron 2008 Form 1040 Return	R. 112-5	1819-30
41	Pieron 2008 Form 1040X Return	R. 112-6	1831-51
42	Pieron 2009 Form 1040 Return	R. 112-7	1852-62
43	Pieron 2010 Form 1040 Return	R. 114-14	2109-17
45	Pieron Form 9465 Installment Agreement Filed	R. 114-15	2118-21
46/207	Pieron Offer-of-compromise	R. 114-16	2122-25
47	Collection Information Statement	R. 114-17	2126-27
48	Form 1040X for James D. Pieron, Jr., 2009	R. 112-8	1863-94
52	2007 Payment Vouchers	R. 114-18	2128
53	2008 Payment Vouchers	R. 114-19	2129

Gov. Ex. No.	Description	Docket No.	PgId No.
54	2009 Payment Vouchers	R. 114-20	2130
55	2010 Payment Vouchers	R. 114-21	2131
56	Client Contact Log	R. 114-22	2132-54
57	Email to Carol Nathan regarding Saxo Bank Statements 2007-2010	R. 114-23	2155-67
58	Email to Carol Nathan regarding Foreign Income	R. 114-24	2168
61	2008 Pieron Initial Spreadsheet of Capital Gains and Losses	R. 114-25	2169
62	2009 Pieron Initial Spreadsheet of Capital Gains and Losses	R. 114-26	2170-71
63	Pieron Revised Spreadsheet of Capital Gains and Losses 2007, 2008, 2009	R. 114-27	2172-75
64	Swiss Record of Foreign Income, withholdings	R. 114-28	2176-77
65	2007 Saxo Bank Account Statements	R. 114-29	2178-79
67	2008 Saxo Bank Account Statements	R. 114-30	2180-83
68	2009 Saxo Bank Account Statements	R. 114-31	2184-88
70	2010 Saxo Bank Account Statement	R. 114-32	2189
89	2009 FBAR Prepared by AHP	R. 114-33	2190-93
91	IB Technologies loan and capital account	R. 114-34	2194
92	Installment agreement preparation file	R. 114-35	2195-99
93	IRS Notice-Bal Due for 2009	R. 114-36	2200-03
94	IRS Notice-Bal Due for 2008	R. 114-37	2204-07
95	K-1 (Kresent Media LLC) 2013	R. 114-38	2208-12
102	2009 Mercedes Purchase Agreement-Exotic Motors	R. 114-39	2213-15
103	National City Bank Official Check \$107,000 to Exotic Motors	R. 114-40	2216
104	Cashier's check to Central Michigan Pianos \$18,000	R. 114-41	2217
106A	Deposit ticket \$15,000 to Pieron checking 07/29/2011 – Fifth Third Bank	R. 114-42	2218
106B	IB Tech check for \$15,000 to Pieron, 7/29/2011	R. 114-43	2219
106C	IB Tech check to Pieron for \$15,000.00, 7/29/2011	R. 114-44	2220

Gov. Ex. No.	Description	Docket No.	PgId No.
107A	Deposit ticket \$12,050 check from IB Tech 07/29/2011 – Fifth Third Bank	R. 114-45	2221
107B	IB Technologies check to Pieron, \$12,050.00	R. 114-46	2222
108A	Deposit ticket \$42,000, 12/28/2010, Fifth Third Bank	R. 114-47	2223
108B	Komplique check #1083 \$42,000 Deposited to Checking – Fifth Third Bank	R. 114-48	2224
109	Institutional Liquidity Account April 2010 Statement	R. 114-49	2225
110	Signature Card for Institutional Liquidity Account	R. 114-50	2226
111	Signature Cards James Pieron Checking Account – Fifth Third Bank	R. 114-51	2227-28
112	Signature Card James Pieron Savings Account – Fifth Third Bank	R. 114-52	2229
113	Statements of Account James Pieron Checking – Fifth Third Bank Nov. 24, 2010 to Dec. 23, 2011	R. 114-53	2230-55
114	Wire transfers to James Pieron Personal Accounts Fifth Third Bank	R. 114-54	2256-61
115	Account Opening Documents James Pieron Account FQ562-Peregrine Financial Group, Form W-8BEN	R. 114-55	2262-67
116	August 2009 Statement of Account FC6562-Peregrine Financial Group \$50,000 wire transfer	R. 114-56	2268
117	Wire Transfer records - Peregrine Financial Group	R. 114-57	2269
118	UBS AG-JDFX Dec. 2008 - Nov. 2009 Holding Account Statements	R. 114-58	2270-82
119	Credit Suisse-JDFX Mgmt, LTD – account statements March 31, 2007 – September 30, 2009	R. 114-59	2283-97
120A	June 2009 Account Statement for IB Technologies Checking Account – PNC Bank	R. 114-60	2298-99
120B	Oct. 2009 Account Statement for IB Technologies Checking Account – PNC Bank	R. 114-61	2300-02
120C	Nov. 2009 Account Statement for IB Tech Checking	R. 114-62	2303-05
120D	April 2010 Account Statement for IB Tech Checking	R. 114-63	2306-07
120E	Jan. 2011 Account Statement for IB Tech Checking	R. 114-64	2308-10
120F	Feb. 2011 Account Statement for IB Tech Checking	R. 114-65	2311-12
120G	July 2011 Account Statement for IB Tech Checking	R. 114-66	2313-15
120H	Aug. 2011 Account Statement for IB Tech Checking	R. 114-67	2316-17

Gov. Ex. No.	Description	Docket No.	PgId No.
121A	Aug. 2009 Account Statement for Komplique Inc. Checking Account-PNC Bank	R. 114-68	2318-19
121B	2010 Account Statements for Komplique Inc. Checking Account-PNC Bank	R. 114-69	2320-52
121C	2011 Account Statements for Komplique Inc. Checking Account-PNC Bank	R. 114-70	2353-97
122	July 2011 Account Statement for Komplique Inc. Savings Account-PNC Bank	R. 114-71	2398-99
124	IB Technologies Inc. check to Komplique/James Pieron Memo for \$350,000.00-PNC Bank	R. 114-72	2400
125	IB Technologies Inc withdrawal- \$8,625.00, 7/29/11	R. 114-73	2401
126	IB Tech Check for \$5,000.00 cash 8/9/11	R. 114-74	2402
127	IB Tech Check for \$5,000.00 cash 8/18/11	R. 114-75	2403
128	IB Tech check for \$6,684.24 to Pieron 11/28/11	R. 114-76	2404
129	IB Technologies Wire Transfer records-PNC Bank	R. 112-9	1895-1901
130	Komplique Inc. check for \$29,805.79 #1086 payable to Air Services-PNC Bank	R. 114-77	2405
131	Komplique Inc. checks #1121, #1155 payable to M-Z Air - PNC Bank	R. 114-78	2406-07
132	Komplique Inc. check for \$20,000 #1226 payable to Central Michigan Piano-PNC Bank	R. 114-79	2408
133	Komplique Inc. check payable to cash for \$39,797.00 - PNC Bank	R. 114-80	2409
134	Komplique Wire Transfer Documents-PNC Bank	R. 114-81	2410-11
135	Signature Card for IB Technologies Inc. Checking Account-PNC Bank	R. 114-82	2412-14
136	Signature Card for IB Technologies Inc. Savings Account-PNC Bank	R. 114-83	2415
137	Signature Card for Komplique Inc. Checking Accounts-PNC Bank	R. 114-84	2416-19
138	Wire Transfer documents-Wells Fargo	R. 114-85	2420-31
168	Komplique Inc. Acct. #4252699899 Statement 3/30/13-4/30/13 and check \$50,000.00-PNC	R. 114-86	2432-35
169	Komplique Inc. Statement 12/31/11-1/31/2012 and signature card Acct. #4257062686 - PNC Bank	R. 114-87	2436-38
170	Purchase and payment records for 2013 Mercedes	R. 114-88	2439-44

Gov. Ex. No.	Description	Docket No.	PgId No.
171	2009 Mercedes Benz Title	R. 114-89	2445
172	Komplique Corporate Resolution and Articles of Incorporation	R. 114-90	2446-51
173A	Handwriting charts - printing	R. 114-91	2452
173B	Handwriting chart - signatures	R. 114-92	2453
174	Volkswagen Purchase Suburban Imports of Troy	R. 114-93	2454-56
175	Navitas Investment account statement August 2010	R. 114-94	2457
176	Full Throttle records	R. 114-95	2458-82
178	Handwriting exemplars	n/a	Not filed
179	Komplique IRS transcript	R. 114-96	2483
180	IRS 2011 account transcript for Pieron	R. 114-97	2484-85
181	IRS 2012 account transcript for Pieron	R. 114-98	2486-87
182	IRS 2013 account transcript for Pieron	R. 114-99	2488-89
183	IRS 2014 account transcript for Pieron	R. 114-100	2490-91
184	IRS 2015 account transcript for Pieron	R. 114-101	2492-93
185	IRS 2016 account transcript for Pieron	R. 114-102	2494-95
	Additional Government Exhibits		
200	SEC Memo of Interview w/ James Pieron 11/3/2009	R. 112-10	1902-10
201	Sale and Purchase Agreement for 20% Equity	R. 112-11	1911-14
202	Sale and Purchase Agreement for Add'l 15% Equity	R. 112-12	1915-18
203	12/22/2010 email from Pavlik to Pieron	R. 112-13	1919-20
204	Pieron letter to Pavlik regarding JDFX failure	R. 112-14	1921
205	Carol Nathan note	R. 112-15	1922
206	Pieron 2911 Form 1040X return	R. 112-16	1923-72
207*	Offer-in-compromise	R. 112-17	1973-93
	*207 was admitted as government trial exhibit 46	R. 114-16	2122-25